



Advocates for Workplace Fairness

December 17, 2020

**Via ECF:**

The Honorable Gabriel W. Gorenstein  
United States District Court  
for the Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *Ulku Rowe v. Google LLC, Case No. 19-cv-08655 (LGS)(GWG)***

Dear Judge Gorenstein:

We represent Plaintiff Ulku Rowe in the above-referenced matter. Pursuant to Rule 1.E. of Your Honor's Individual Rules, the Parties jointly write to respectfully request an extension of time for the Parties to (i) complete depositions; (ii) complete expert discovery; and (iii) file their pre-motion conference letters for permission to make a summary judgment motion. The Parties request that the Court so order the Joint Stipulation and Proposed Order attached hereto as Exhibit 1, and adjourn the aforementioned deadlines until thirty (30) days following the Court's order(s) with respect to the pending and forthcoming motions set forth below.

On November 23, 2020, Defendant requested a pre-motion conference on its anticipated motion to preclude the deposition of Diane Greene. (ECF No. 62). Plaintiff filed her letter response on December 1 (ECF No. 65) and Defendant filed its reply in further support of its motion on December 4 (ECF No. 66). On December 9, the Court ordered that oral argument on the pending motion will take place on January 5, 2021. The parties have completed all depositions in this matter with the exception of Diane Greene.

On December 16, Plaintiff filed her Motion for Leave to File Supplemental Pleadings. ECF No. 76. Under the Parties' agreed to schedule, Defendant's Response is due December 29, 2020 and Plaintiff's Reply is due January 5, 2021. On December 17, 2020, Plaintiff requested a pre-motion conference in anticipation of her motion to compel the production of discovery related to comparator information. (ECF No. 79). Defendant's response to Plaintiff's pre-motion letter will be filed in the timeframe specified in Your Honor's Individual Rules, unless the Court orders full briefing of the issues, at which time the Parties will abide by the briefing schedule set by the Court. The aforementioned filings relate to key issues in this case, the resolution of which is necessary prior to the Parties' pre-motion conference letters relating to summary judgment.

On December 17, the Parties entered into a stipulation regarding expert discovery. *See* Exhibit 1. Both Parties have agreed to only seek expert testimony related to economic damages



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in this matter. Accordingly, the Parties agree to adjourn, subject to Court approval, the deadline to complete expert discovery until after dispositive motions are fully briefed and decisions are rendered by the Court.

Accordingly, the Parties jointly request an extension to the discovery schedule in this matter, revising the Scheduling Order reflected in ECF Nos. 61, 64, as follows:

Description	Current Deadline	Proposed Deadline
Completions of depositions pursuant to Fed R. Civ. P. 33	December 18, 2020	Fourteen (14) days following the Court's order related to the deposition of Diane Greene
Completion of all expert discovery	December 18, 2020	Forty-five (45) days following the Court's order on all dispositive motions
Pre-Motion Conference Letter Requesting Permission to make a summary judgment motion	December 23, 2020	Thirty (30) days following the Court's order on the Supplemental Pleadings and Comparator Evidence motions, whichever is later
Date of pre-motion conference before Hon. Lorna G. Schofield	January 7, 2021 at 10:40 a.m.	Fourteen (14) days following the deadline to submit Pre-Motion Conference Letters requesting permission to make a summary judgment motion

This is the fourth request to extend discovery deadlines in this matter. The Parties thank the Court for its consideration of this matter.

Respectfully submitted,

  
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cc: All Parties (via ECF)

  
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